

# Exhibit 1

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**ADSTRA, LLC,**

Plaintiff,

v.

Civil Action No. 24-CV-02639

KINNESSO, LLC and

ACXIOM, LLC

## **VIDEOTAPED ORAL DEPOSITION**

OF

**KYLE HOLLOWAY**

(Taken June 7, 2024, at 7:56 a.m.)

1 Q Yes. Okay. And was Adstra data used in building  
2 that Real ID reference graph?

3 MR. SHAFTEL: Objection to form.

4 A So yes.

5 BY MS. AGUILAR:

6 Q How was Adstra data used in building the Real ID  
7 reference graph?

8 A The Real ID reference graph is built by the  
9 Kinesso engineering team and it is -- the Adstra data  
10 is one of over 30 sources that go into their build  
11 process.

12 Q And are those -- I'm going to use the term "PII."  
13 Do you understand what that means?

14 A I do.

15 Q And what does that mean?

16 A Personally identifiable information, includes  
17 name, address, e-mail, phone, and other potential  
18 identifiers.

19 Q And so did Adstra PII go into the Real ID  
20 reference graph?

21 MR. SHAFTEL: Objection to form.

22 A Yes.

23 BY MS. AGUILAR:

24 Q And were there other pieces of Adstra data that  
25 also went into the Real ID reference graph?

1 A We evaluated a match rate to the IP address as  
2 well as a hashed representation of the user agent  
3 fields and their connectivity to the hashed e-mail.  
4 This was part of the evaluation for our visitor insight  
5 product.

6 Q Is the visitor insight product part of the suite  
7 of Real ID products?

8 A It is an add-on.

9 Q What do you mean by that?

10 A Meaning it's sold separately.

11 Q And what were the results of the evaluation of  
12 that data?

13 A We chose not to proceed.

14 Q Why not?

15 A The mat tray efficacy wasn't what we were looking  
16 for.

17 Q Does the Visitor Insight product exist today?

18 A It does.

19 Q And does it contain any of the Adstra data that  
20 was sent pursuant to the evaluation agreement?

21 A It does not.

22 Q Where did that data go if it's not being used by  
23 Axiom?

24 A It remained in the storage location where it was  
25 housed.

1 A I directed Kinesso product manager to remove that  
2 data from the build.

3 Q Who is that person?

4 A Veena Xavier.

5 Q And then was she in charge of removing that data  
6 from the build of the reference graph?

7 MR. SHAFTEL: Objection to form.

8 A She's the product manager and, therefore,  
9 responsible to make sure that takes place.

10 BY MS. AGUILAR:

11 Q Do you know how long -- well, withdrawn.

12 Do you know whether Veena followed your  
13 instruction and caused the Adstra data to be removed  
14 from the build of the reference graph?

15 A Yes.

16 Q How do you know that?

17 A Confirmation from her as well as a report would  
18 show that data was no longer present.

19 Q So specifically what of Adstra's data was removed  
20 from the build of the reference graph?

21 A The terrestrial data.

22 Q Anything else?

23 A That's the only data from Adstra that's been  
24 extrapolated as part of the build.

25 Q And so when that data was removed from the build